

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

No. 1:23-cv-5749

v.

RICHARD J. SCHUELER, a/k/a RICHARD HEART,
HEX, PULSECHAIN, and PULSEX,

**NOTICE OF MOTION
TO ADMIT COUNSEL
*PRO HAC VICE***

Defendants.

PLEASE TAKE NOTICE that upon the annexed affidavit of movant in support of this motion and the Certificate of Good Standing annexed thereto, I Nicolas Morgan will move this Court pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an order allowing the admission of movant, an attorney employed by Investor Choice Advocates Network and a member in good standing of the bar of the State of California, as attorney *pro hac vice* to argue or try this case in whole or in part as counsel for *Amicus Curiae* PulseChain Foundation DAO. There are no pending disciplinary proceedings against me in any state or federal court.

Dated: May 1, 2024
Ventura, CA

By: /s/ Nicolas Morgan
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*Attorney for Amicus Curiae PulseChain
Foundation DAO*